April 26, 2002

Mr. Christopher Heaton
Adorn, LLC
1808 W. Hively Avenue
Elkhart, Indiana 46577

Re: 039-15653
Third Administrative Amendment to:
Part 70 permit No.: T039-7650-00324

Dear Mr. Heaton:

Adorn, LLC was issued Part 70 operating permit T039-7650-00324 on October 6, 1998 for a stationary wood countertop and cabinet manufacturing plant. A letter indicating Adorn's intention to relocate some woodworking equipment and a MDF board laminating machine from Plant 1 (W. Hively Avenue) to Plant 3 (County Road, No. 3), and install a new cyclonic baghouse system (identified as C6) in Plant 3 to control of emissions of particulate matter from the woodworking facilities was received on March 7, 2002.

Currently, Adorn has several pieces of woodworking equipment located in Plant 1. The current maximum throughput for the woodworking operation is 25,000 pounds per hour. The emissions are currently controlled using a cyclonic baghouse (identified as C5) which has an outlet grain loading of 0.001gr/scfm and a control efficiency of 99 percent. Since the individual woodworking units are used in series to produce the final product, relocating some of this equipment to a different building does not increase the maximum amount of wood that can be processed or amount of emissions generated by the woodworking equipment. Hence, the maximum throughput remains 25,000 pounds per hour. The new cyclonic baghouse (identified as C6) will have specifications that are similar to the existing baghouse (C5). The outlet grain loading will be 0.0008 to 0.001 gr/scfm, the control efficiency will be 99 to 99.9%, and the air flow will be 50,000 cfm. Hence, the new woodworking operation in Plant 3 will meet the definition of an insignificant woodworking operation defined in 2-7-1(21)(G)(xxix). Note that the baghouse is the only part of the control device that controls the PM and PM-10 emissions and is therefore the device that enables the woodworking operations to meet the regulatory requirements. Since the woodworking equipment in Plant 3 will meet the definition of an insignificant activity and the compliance monitoring and recordkeeping requirements for the new baghouse are the same as those currently included in the Title V permit, these changes to the plant are being processed as an Administrative Amendment pursuant to the provisions of 326 IAC 2-7-11. The permit is hereby administratively amended as follows:

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This wood counter top and cabinet manufacturing company consists of three (3) plants:

(a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;

(b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and

(c) Plant 3 is located at 58038 County Road No. 3, Elkhart, Indiana 46517.

Since the three (3) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source.

A.~~3~~2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1 (W. Hively Avenue):

(a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;

(b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;

(c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5;

(d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;

(e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.

(f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.

(g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.

(h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.

(i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.

~~(j) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack, identified as C5;~~

(**j**~~k~~) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5;

(**k**~~l~~) Two (2) denibbers for D1, with a maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.

(**l**~~m~~) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.

(**m**~~n~~) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

Plant 2 (Nagy Drive):

(**n**~~o~~) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;

(**o**~~p~~) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

(**p**~~q~~) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

(q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as C6).

A.~~4~~3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas-fired boiler, rated at 0.4 MMBtu/hr, and exhausting to stack B1;

(b) Three (3) natural gas-fired radiant heaters, each rated at 0.2 MMBtu/hr, and exhausting to stacks H1, H2 and H3, respectively; and

(c) Three (3) natural gas-fired hot water boilers, identified as AB1, AB2, and AB3, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, and AB3, respectively..

(d) Woodworking equipment located in Plant 3, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse (identified as C6), which has an outlet grain

loading of 0.001 grains per dry standard cubic feet of outlet air and an exhaust air flow of 50,000 cubic feet per minute.

A.~~5~~**4** Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 1 (W. Hively Avenue):

(d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;

(e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.

(f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.

(g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.

(h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.

(i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.

~~(j) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack identified as C5.~~

(**j**~~k~~) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5.

(**m**~~n~~) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

Facility Description [326 IAC 2-7-5(15)]

Plant 2 (Nagy Drive):

(**n**~~o~~) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;

(**o**~~p~~) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

(**p**~~q~~) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

(q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as C6).

(The information describing the process contained in this facility description is descriptive information and does not constitute enforceable conditions.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 1 (W. Hively Avenue):

(a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;

(b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;

(c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5.

(**k**~~t~~) Two (2) denibbers for D1, with maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.

(**l**~~m~~) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) Woodworking equipment located in Plant 3, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse (identified as C6), which has an outlet grain loading of 0.001 grains per dry standard cubic feet of outlet air and an exhaust air flow of 50,000 cubic feet per minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations in Plant 3 controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

(a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.

(b) The opacity from each baghouse shall not exceed ten percent (10%).

(c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

(1) The baghouse shall be inspected.

(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities located in Plant 3 shall not exceed *22.3* pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour;
and
P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.4 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxix)(DD)]

The baghouse for PM control shall be in operation at all times when the woodworking facilities are in operation.

D.4.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.4.1(c) are not required, and will be replaced by the following:

(a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.1(c) and Condition D.4.6 and the dates the vents are redirected.

(b) To document compliance with Condition D.4.1(c) and Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.

(c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd)

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Amanda Baynham, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7910 to speak directly to Ms. Baynham. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/AB

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Adorn, LLC.
1808 West Hively Avenue
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7650-00324	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 6, 1998 Expiration Date: October 6, 2003

First Minor Source Modification No.039-11334, issued January 3, 2000
First Significant Permit Modification No.: 039-11565, issued February 7, 2000
First Administrative Amendment No.: 039-12127, issued April 14, 2000
Second Administrative Amendment No.: 039-13886, issued February 14, 2001
First Reopening No.: R-039-13209, issued December 18, 2001
Second Minor Source Modification No.: 039-15677, issued (pending)
Second Minor Permit Modification No.: 039-15410, issued (pending)

Third Administrative Amendment No.: 039-15653-00324	Pages Affected: 4, 5, 7, 28, 29, 40, 41, 42
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 26, 2002

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary wood counter top and cabinet manufacturing source.

Responsible Official:	Todd Cleveland
Source Address:	1808 West Hively Avenue, Elkhart, Indiana 46517; and 57420 Nagy Drive, Elkhart, Indiana 46517
Mailing Address:	1808 West Hively Avenue, Elkhart, Indiana 46517
SIC Code:	2499
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This wood counter top and cabinet manufacturing company consists of three (3) plants:

(a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;

(b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and

(c) Plant 3 is located at 58038 County Road No. 3, Elkhart, Indiana 46517.

Since the three (3) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1 (W. Hively Avenue):

(a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;

(b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;

(c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5;

(d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure

(HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;

(e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.

(f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.

(g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.

(h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.

(i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.

(j) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5;

(k) Two (2) denibbers for D1, with a maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.

(l) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.

(m) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

Plant 2 (Nagy Drive):

(n) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;

(o) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

(p) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

(q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) One (1) natural gas-fired boiler, rated at 0.4 MMBtu/hr, and exhausting to stack B1;

(b) Three (3) natural gas-fired radiant heaters, each rated at 0.2 MMBtu/hr, and exhausting to stacks H1, H2 and H3, respectively; and

(c) Three (3) natural gas-fired hot water boilers, identified as AB1, AB2, and AB3, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, and AB3, respectively.

(d) Woodworking equipment located in Plant 3, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse (identified as C6), which has an outlet grain loading of 0.001 grains per dry standard cubic feet of outlet air and an exhaust air flow of 50,000 cubic feet per minute.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document

is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC

5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION **SOURCE OPERATION CONDITIONS**

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC is limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.
The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 1-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 1 (W. Hively Avenue):

(d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;

(e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.

(f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.

(g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.

(h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.

(i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.

(j) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5.

(m) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]

Plant 2 (Nagy Drive):

(n) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;

(o) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

(p) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

(q) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).

(The information describing the process contained in this facility description is descriptive information and does not constitute enforceable conditions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The two automated staining machines, back sealing, and sealing machines, and the touch-up booth, and pursuant to CP-039-8835-00324, issued on December 29, 1997, the remaining surface coating facilities shall not exceed 41,500 pounds of VOC, including coatings, adhesives, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

(a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in the MDF laminating machine, Corian process, the dualtech automated back sealing machine, the two rototech automated staining machine, the dualtech sealing machine, and the touch-up booth shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(b) The adhesive spray booth, the wood laminating machine, the gypsum laminating machine, and the wood wrapping machines shall comply with the requirements of 326 IAC 8-2-12, if any change or modification to any of these facilities would increase actual emissions from the facility to above fifteen (15) pounds per day.

D.1.3 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

(a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.

(b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:

(A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or

(B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(D) Use a combination of (A), (B), and (C).

(2) Limit VHAP emissions contact adhesives as follows:

(A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.

(B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

A copy of this rule is enclosed.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 the dualtech automated back-sealing, the two rototech automated staining machines, the dualtech sealing machines, and the touch-up booth, and pursuant to CP-039-4472-00324, issued on August 8, 1995, CP-039-4803-00324, issued on November 14, 1995, and CP-039-8835-00324, issued on December 29, 1997, the PM from the laminating machines and the adhesive booth, E1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.1.5 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

(a) Operator training course.

(b) Leak inspection and maintenance plan.

(c) Cleaning and washoff solvent accounting system.

(d) Chemical composition of cleaning and washoff solvents.

(e) Spray booth cleaning.

(f) Storage requirements.

(g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).

(h) Line cleaning.

(i) Gun cleaning.

(j) Washoff operations.

(k) Formulation assessment plan for finishing operations.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

(a) Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

(b) The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer.

IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Particulate Matter (PM)

(a) Pursuant to CP-039-4472-00324, issued on August 8, 1995, CP-039-4803-00324, issued on November 14, 1995, and CP-039-8835-00324, issued on December 29, 1997, the dry filters and baghouse/cyclone system for PM control shall be in operation at all times when the associated equipment is in operation.

(b) The dry filters, water walls and scrubbers for PM control for the automated surface coating machines and the touch-up spray booth shall be in operation at all times when the associated equipment is in operation.

D.1.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters, and to verify the correct operation of the water walls and the correct flow of water to the water walls. To monitor the performance of the dry filters controls, weekly observations shall be made of the overspray from the surface coating stacks while one or more of these process are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from all surface coating stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubbers used in conjunction with the automated surface coating operations, at least once per shift when the associated machines are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the scrubbers shall be maintained within the range of 1 and 3 inches of water, or a range established for each during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C- Pressure Gauge Specifications of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.13 Scrubber Inspections

An inspection shall be performed each calendar quarter of the scrubbers controlling the surface coating finishing operations when venting to the atmosphere. A scrubber inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are operational when venting to the indoors.

D.1.14 Scrubber Failure

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.15 Record Keeping Requirements

(a) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.3.

(1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.

(2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.

(3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.

(4) The VHAP content in weight percent of each thinner used.

(5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.

(b) To document compliance with Conditions D.1.1 and D.1.2(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1.

(1) The amount and VOC content of each coating and adhesive material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.

(e) To document compliance with Condition D.1.12, the Permittee shall maintain the following:

(1) Records, taken once per shift, of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/AC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(f) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13, and the dates the vents are redirected.

(g) All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) An Initial Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted within sixty (60) days following the compliance date of December 7, 1998. The Initial Compliance Report must include data from the entire month that the compliance date falls.

(c) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.3 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

(1) January 1 through June 30.

(2) July 1 through December 31.

(d) The reports required in (b) and (c) of this condition shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 1 (W. Hively Avenue):

(a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;

(b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;

(c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5.

(k) Two (2) denibbers for D1, with maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.

(l) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities exhausting to stack B2 shall not exceed 22.3 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities exhausting to stack C5 shall not exceed 22.3 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

(c) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 Particulate Matter (PM) [326 IAC 2-7-5(1)]

Pursuant to 326 IAC 2-7-5(1), the area surrounding the storage silo shall be maintained free of sawdust.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Particulate Matter (PM)

Pursuant to CP-039-4472-00324, issued on August 8, 1995, CP-039-4803-00324, issued on November 14, 1995, and CP-039-8835-00324, issued on December 29, 1997, the baghouse/cyclone systems for PM control shall be in operation at all times when the associated equipment is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse/cyclone stack exhausts B2 and C5 shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.8 Broken Bag or Failure Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

(b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

D.2.9 Storage Silo Inspections

An inspection of the sawdust outloading operation and storage silo shall be performed at least once every two weeks. The Compliance Response Plan for the woodworking operations shall contain troubleshooting contingency and response steps for the sawdust outloading operation when abnormal emissions are observed or there is evidence of sawdust in the area surrounding the storage silo.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse/cyclone stack B2 and C5 exhaust.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

(c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activities:

(a) One (1) natural gas-fired boiler, rated at 0.4 MMBtu/hr, and exhausting to stack B1.

(b) Three (3) natural gas-fired radiant heaters, each rated at 0.2 MMBtu/hr, and exhausting to stacks H1, H2 and H3, respectively.

(c) Three (3) natural gas-fired hot water boilers, identified as AB 1, AB2, AB3, with each rated at 1 MMBtu per hour, exhausting to stacks AB1, AB2, and AB3, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the natural gas-fired boilers and each of the radiant heaters shall be limited to 0.6 pounds per MMBtu heat input when Q equals 4 MMBtu per hour.

This limitation is based on the fact that the following equation yields a limit greater than 0.6, but 326 IAC 6-2-4(a) states that the limitation shall not exceed 0.6 pounds per MMBtu heat input.

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(d) Woodworking equipment located in Plant 3, having a maximum throughput capacity of 25,000 pounds of wood per hour. Emissions of particulate matter are controlled using a cyclonic baghouse (identified as C6), which has an outlet grain loading of 0.001 grains per dry standard cubic feet of outlet air and an exhaust air flow of 50,000 cubic feet per minute.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Baghouse Limitations [326 IAC 2-7-1(21)(G)(xxix)]

The woodworking operations in Plant 3 controlled by a baghouse shall be an insignificant activity for Title V permitting purposes provided that the baghouse operations meet the requirements of 326 IAC 2-7-1(21)(G)(xxix), including the following:

(a) Each woodworking baghouse shall not exhaust to the atmosphere greater than one hundred twenty-five thousand (125,000) cubic feet of air per minute and shall not emit particulate matter with a diameter less than ten (10) microns in excess of three-thousandths (0.003) grain per dry standard cubic foot of outlet air.

(b) The opacity from each baghouse shall not exceed ten percent (10%).

(c) Visible emissions from the baghouse shall be observed daily using procedures in accordance with Method 22 and normal or abnormal emissions are recorded. In the event abnormal emissions are observed for greater than six (6) minutes in duration, the following shall occur:

(1) The baghouse shall be inspected.

(2) Corrective actions, such as replacing or reseating bags, are initiated, when necessary.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the woodworking facilities located in Plant 3 shall not exceed *22.3* pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.4 Particulate Matter (PM) [326 IAC 2-7-21(1)(G)(xxix)(DD)]

The baghouse for PM control shall be in operation at all times when the woodworking facilities are in operation.

D.4.5 Baghouse Inspections [326 IAC 2-7-21(1)(G)(xxix)(FF)

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Visible Emissions Notations

Should the source elect to not have the woodworking operations considered an insignificant activity for Title V permitting purposes, the Method 22 readings required in Condition D.4.1(c) are not required, and will be replaced by the following:

(a) Daily visible emission notations of each baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.4.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.1(c) and Condition D.4.6 and the dates the vents are redirected.

(b) To document compliance with Condition D.4.1(c) and Condition D.4.6, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.

(c) The Permittee shall maintain records of corrective actions to document compliance with 326 IAC 2-7-21(1)(G)(xxix)(GG)(dd)

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Adorn, Inc.
Source Address: 1808 W. Hively, Elkhart, Indiana 46517
Mailing Address: 1808 W. Hively, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7650-00324

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Adorn, LLC
Source Address: 1808 W. Hively, Elkhart, Indiana 46517
Mailing Address: 1808 W. Hively, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7650-00324

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Adorn, LLC
Source Address: 1808 W. Hively, Elkhart, Indiana 46517
Mailing Address: 1808 W. Hively, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7650-00324
Facility: All Laminating/Surface Coating Facilities
Parameter: VOC
Limit: 41,500 pounds per month

YEAR: _____

Month	VOC Usage (pounds)	VOC Limit (pounds)
1		41,500
2		41,500
3		41,500

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Adorn, LLC
Source Address: 1808 W. Hively, Elkhart, Indiana 46517
Mailing Address: 1808 W. Hively, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7650-00324

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No Deviations Occurred this Reporting Period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
Semi-Annual Report
VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Adorn, LLC
Source Address: 1808 W. Hively, Elkhart, Indiana 46517
Mailing Address: 1808 W. Hively, Elkhart, Indiana 46517
Part 70 Permit No.: T039-7650-00324
Facility: Surface Coating
Parameter: VOC and VHAPs - NESHAP
Limit:
(1) Finishing operations -1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR:_____

Month	Finishing Operations (lb VHAP/lb Solid)	Thinners used for on-site formulation (% by weight)	All other thinner mixtures (% by weight)	Foam adhesives (upholstered) (lb VHAP/lb Solid)	Contact adhesives (lb VHAP/lb Solid)	Strippable spray booth material (lb VOC/lb Solid)
1						
2						
3						
4						
5						
6						

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this six month period.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Part 70 Minor Source Modification and Minor Permit Modification

Source Background and Description

Source Name:	Adorn, LLC
Source Location:	1808 West Hively Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	2499
Operation Permit No.:	T 039-7650-00324
Operation Permit Issuance Date:	October 6, 1998
Minor Source Modification No.:	039-15653-00324
Minor Permit Modification No.:	039-15847-00324
Permit Reviewer:	ERG/AB

The Office of Air Quality (OAQ) has reviewed a modification application from Adorn, LLC relating to the relocation of the following emission units and the construction of the following pollution control devices:

Plant 3 (County Road No. 3)

(q) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone and baghouse system (identified as C6) to control particulate matter, and exhausting to one (1) stack (identified as A15).

(r) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).

History

On March 4, 2002, Adorn, LLC submitted an application to the OAQ requesting to relocate woodworking equipment to a new building located at the source and add an additional cyclone and baghouse to control PM emissions from this equipment. Specifically, Adorn plans to move the panel saw, the high pressure laminate (HPL) machine, two (2) slotwall machines, and the edgebanding machine from Plant 1 to Plant 3. The existing dust collection equipment located in Plant 1 will remain in place. Adorn, LLC was issued a Part 70 permit on October 6, 1998. The following modifications and revisions have been made to the Title V permit:

(a) First Minor Source Modification (039-11334-00324), issued on January 3, 2000.

(b) First Significant Permit Modification (039-11565-00324), issued on February 7, 2000.

(c) First Administrative Amendment (039-12127-00324), issued on April 14, 2000.

(d) Second Administrative Amendment (039-13886-00324), issued on February 14, 2001.

(e) First Reopening to Part 70 Operating Permit (039-13209-00324), issued on December 18, 2001.

(f) Second Minor Source Modification (039-15677-00324); (pending).

(g) First Minor Permit Modification (039-15410-00324); (pending).

Source Definition

This stationary wood countertop and cabinet manufacturing company consists of three (3) plants:

(a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517.
(b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517.
(c) Plant 3 is located at 58038 County road, No. 3, Elkhart, Indiana 46517.

Since the three (3) plants are adjacent, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 4, 2002. Additional information was received on April 3, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (1 page).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	906
PM-10	906
SO_2	0.00
VOC	0.00
CO	0.00
NO_x	0.00

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(3), which states that a modification involving a pollution control project or pollution prevention project as defined in 326 IAC 2-1.1-1(13) that do not increase the potential to emit PM10 greater than or equal to fifteen (15) tons per year or any other regulated pollutant greater than the thresholds in 326 IAC 2-7-10.5(d)(4), but require a significant change in the methods of demonstrating or monitoring compliance, may be processed as a Minor Source Modification.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for PM10, SO_2, NO_2 CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	110.1
PM-10	110.1
SO_2	0.18
VOC	249.1
CO	0.30
NOx	1.5
HAPs	47.4

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the emission estimates provided in the technical support document (TSD) to the Minor Source Modification (039-11334-00324), issued on January 3, 2000.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
All surface coating	3.3	3.3	0	249.0	0	0	47.4
Woodworking*	106.6	106.6	0	0	0	0	0
Insignificant Activities	0.18	0.18	0.18	0.009	0.30	1.5	0
Total Emissions	110.1	110.1	0.18	249.1	0.3	1.5	47.4

* Source wide emissions. Controlled emissions from the new control system (C6) are 9.1 tpy.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(b) As indicated in the Title V permit (039-7650-00324), the MDF board laminating machine is subject to the provisions of 40 CFR 63, Subpart JJ.

Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:

(a) Limit the volatile hazardous air pollutants (VHAP) emissions from finishing operations as follows:

(1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound of solids as applied; or

(2) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of 1.0 pound VHAP per pound of solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a 3.0 percent maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or

(4) Use a combination of (1), (2), and (3).

(b) Limit VHAP emissions contact adhesives as follows:

(1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed one and eight-tenths (1.8) pound VHAP per pound of solids.

(2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed on (1.0) pound VHAP per pound solids as applied.

(3) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids as applied.

(d) The source shall maintain a work practice implementation plan defining environmentally desirable work practices for each wood furniture manufacturing operation. Then plan should address at a minimum each of the work practices defined in 40 CFR 63.803, including:

(1) Operator training course.
(2) Leak inspection and maintenance plan.
(3) Cleaning and washoff solvent accounting system.
(4) Chemical composition of cleaning and washoff solvents.
(5) Spray booth cleaning.
(6) Storage requirements.
(7) Conventional air spray guns shall only be used under the circumstances defined under 63.803(h).
(8) Line cleaning.
(9) Gun cleaning.
(10) Washoff operations.
(11) Formulation assessment plan for finishing operations.

(e) A semi-annual summary report that documents the ongoing compliance status of the wood furniture coating operations.

State Rule Applicability - Woodworking Facilities

The particulate matter (PM) from the woodworking facilities exhausting at stack A15 shall not exceed 22.3 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

The PM emission rate was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The new cyclone and baghouse (identified as C6) shall be in operation at all times the woodworking facilities are in operation, in order to comply with this limit.

Based on the air flow rate and outlet grain loading specifications, the source will emit a maximum of 2.1 pounds of PM per hour from the baghouse. Therefore, the source will be in compliance with the requirements of 326 IAC 6-3-2.

State Rule Applicability - MDF Board Laminating Machine

Since this unit is being relocated from Plant 1, all applicable requirements for this emission unit are already included in the source's Title V permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) The woodworking facilities have applicable compliance monitoring conditions as specified below:

(1) Daily visible emission notations of the baghouse stack exhaust (identified as C6) shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(2) An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(3) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions.

(4) An inspection shall be performed each calender quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

(5) In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions.

These monitoring conditions are necessary because the cyclone and baghouse (identified as C6) used to control PM emissions from the woodworking facilities must operated properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Proposed Changes

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This wood counter top and cabinet manufacturing company consists of three (3) plants:

(a) Plant 1 is located at 1808 West Hively Avenue, Elkhart, Indiana 46517;

(b) Plant 2 is located at 57420 Nagy Drive, Elkhart, Indiana 46517; and

(c) Plant 3 is located at 58038 County Road No. 3, Elkhart, Indiana 46517.

Since the three (3) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they are considered one (1) source.

A.~~3~~**2** Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Plant 1 (W. Hively Avenue):

(a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;

(b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;

(c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5;

(d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;

(e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.

(f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.

(g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.

(h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.

(i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.

~~(j) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack, identified as C5;~~

(**j**~~k~~) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5;

(**k**~~l~~) Two (2) denibbers for D1, with a maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.

(**l**~~m~~) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.

(**m**~~n~~) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

Plant 2 (Nagy Drive):

(**n**~~o~~) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;

(**o**~~p~~) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

(**p**~~q~~) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

(q) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone and baghouse system (identified as C6) to control particulate matter, and exhausting to one (1) stack (identified as A15).

(r) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).

A.**4**~~3~~ Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

A.**5**~~4~~ Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 1 (W. Hively Avenue):

(d) One (1) adhesive spray booth and one (1) wood wrapping press, with a maximum capacity of laminating 39.143 linear feet per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of particulate matter, exhausting to one (1) stack, identified as E1;

(e) One (1) dualtech automated back sealing machine, identified as D1, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless /air assisted spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D2, exhausting to stack A1, a flash off tunnel exhausting to stack A2, and a hot air drying tunnel exhausting to stack A3.

(f) One (1) rototech automated staining machine, identified as D3, with a maximum capacity of 3,900 board feet per hour, consisting of twenty (20) airless/air assist spray guns, with PM emissions controlled by dry filters, exhausting to stacks A4 and A5, and an infrared drying tunnel exhausting to stack A6.

(g) One (1) dualtech automated sealing machine, identified as D4, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D5, exhausting to stack A7, with a flash off tunnel and a hot air drying tunnel exhausting to stack A8.

(h) One (1) dualtech automated finishing machine, identified as D6, with a maximum capacity of 3,900 board feet per hour, consisting of eight (8) airless/air assist spray guns, with PM emissions controlled by a water wall and water scrubber system, identified as D7, exhausting to stack A9, a flash off tunnel exhausting to stacks A10 and A 11, a hot air drying tunnel exhausting to stack A12, and one (1) non-heated cooling hood exhausting to stack A13.

(i) One (1) manual touch up booth, identified as TU1, with a maximum capacity of 1 gallon of stain, 2 gallons of sealer, and 2 gallons of topcoat per day, consisting of one (1) airless/air assist gun, with dry filters for control of particulate matter, exhausting to one (1)stack TU1.

~~(j) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack identified as C5.~~

(**j**~~k~~) One (1) Corian surface coating line, utilizing a hand application method, with a maximum capacity of 0.75 units per hour, and exhausting to one (1) stack identified as C5.

(**m**~~n~~) One (1) rototech automated staining machine equipped with twenty (20) HVLP spray guns used for coating cabinet doors and an infrared drying oven. The maximum throughput capacity for this unit is 3,900 board feet per hour. Emissions of particulate matter are controlled by dry filers exhausting at stack A14.

SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)

Facility Description [326 IAC 2-7-5(15)]

Plant 2 (Nagy Drive):

(**n**~~o~~) Four (4) wood wrapping machines, with a maximum capacity of 280 pounds of wood styles per hour, and exhausting inside the building;

(**o**~~p~~) One (1) wood panel laminating machine, with a maximum capacity of 1,500 pounds of wood panels per hour, using a baghouse/cyclone system to collect the large particulate matter, and exhausting inside the building; and

(**p**~~q~~) One (1) gypsum sheet laminating machine, with a maximum capacity of 2,250 pounds of gypsum sheets per hour, and exhausting inside the building.

Plant 3 (County Road No. 3)

(r) One (1) MDF board laminating machine, utilizing a rollcoat application system, with a maximum capacity of 70 units per hour, and exhausting to one (1) stack (identified as A15).

(The information describing the process contained in this facility description is descriptive information and does not constitute enforceable conditions.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant 1 (W. Hively Avenue):

(a) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as B2;

(b) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone/baghouse system to control particulate, and exhausting to one (1) stack, identified as C5;

(c) One (1) sawdust storage silo, with a capacity of 690 cubic yards, collecting sawdust from the control equipment, and venting to the atmosphere through one (1) cyclone, identified as C5.

(**k**~~j~~) Two (2) denibbers for D1, with maximum capacities of 3,900 board feet per hour with PM emissions collected by cyclone C5.

(**l**~~m~~) One (1) denibber for D4, with a maximum capacity of 3,900 board feet per hour, with PM emissions collected by cyclone C5.

Plant 3 (County Road No. 3)

(q) Woodworking equipment, with a maximum throughput of 25,000 pounds of wood per hour, using a cyclone and baghouse system (identified as C6) to control particulate matter, and exhausting to one (1) stack (identified as A15).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities exhausting to stack B2 shall not exceed 22.3 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

(b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities exhausting to stack C5 shall not exceed 22.3 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

(c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities exhausting to stack A15 shall not exceed 22.3 pounds per hour when operating at a process weight rate of 25,000 pounds per hour.

(**d**~~c~~) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.5 Particulate Matter (PM)

Pursuant to CP-039-4472-00324, issued on August 8, 1995, CP-039-4803-00324, issued on November 14, 1995, and CP-039-8835-00324, issued on December 29, 1997 **and in order to comply with D.2.1**, the baghouse/cyclone systems for PM control shall be in operation at all times when the associated equipment is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse/cyclone stack exhausts B2, ~~and~~ C5**, and C6** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.2.10 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones controlling the woodworking operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.2.11 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.**12**~~10~~ Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse/cyclone stack**s** B2**,** ~~and~~ C5**, and C6** exhaust**s**.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.

(c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.

(d) To document compliance with Condition D.2.10, the Permittee shall maintain records of the results of the inspections required under Condition D.2.10 and the dates the vents are redirected.

(**e**~~d~~) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 039-15653-00324, and the operation of this proposed modification shall be subject to the conditions of the proposed Part 70 Minor Permit Modification No. 039-15847-00324.

Appendix A: Emissions Calculations
Particulate Emissions
From Woodworking Operations

Company Name: Adorn, LLC
Address City IN Zip: 1808 West Hively Ave., Elkhart, IN 46517
MSM : 039-15653-00324
Reviewer: ERG/AB
Date: 04/3/02

Woodworking Process Description:

PM Control Equipment: Dust Collector - Cyclone
Grain Loading: 0.01 grains/acf
Air Flow Rate: 24130 acf/m
Control Efficiency: 99%

Emissions After Control :

Hourly PM Emissions = 0.01 (gr/acf) x 24,130 (acf/min) x 60 (min/hr) x 1/7000 (lb/gr) = **2.068 lbs/hr**
Annual PM Emissions = 2.068 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) = **9.059 tons/yr**

Emissions Before Control:

Potential PM Emissions = 9.06 tons/yr / (1-99%) = **905.91 tons/yr**